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Attorney for Defendant  
WENDY LABUDA

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. 2:22-cr-0147-01 WBS
	)	
Plaintiff,	)	STIPULATION REGARDING
	)	CONTINUANCE OF SENTENCING AND
v.	)	NEW DISCLOSURE DATES; FINDINGS
	)	AND ORDER
WENDY LABUDA,	)	
	)	
Defendant.	)	
	)	
	)	
	)	
	)	

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorney JAMES CONOLLY, and the Defendant, WENDY LABUDA, by and through her counsel of record TASHA PARIS CHALFANT, hereby stipulate and request that the Court make the following findings and Order as follows:

1. By previous order, this matter was set for sentencing before Judge William B. Shubb on October 27, 2025.
2. By this stipulation, the defendant now moves to reset the sentencing from October 27, 2025 to January 5, 2026, and to reset the disclosure dates.
3. The parties agree and stipulate, and request that the Court find the following:

STIPULATION AND ORDER FOR CONTINUANCE OF SENTENCING

1 a. According to the original PSR disclosure dates, the draft PSR was due on  
2 September 15, 2025. (Dkt. 182.) It was filed on September 16, 2025 with the understanding  
3 defense counsel could have extra time if needed. (Dkt. 197.) The informal objections were due  
4 on September 29, 2025.

5 b. Counsel promptly arranged for the draft PSR to be mailed to Ms. Labuda who is  
6 housed at the Nevada Southern Detention Center in Pahrump, Nevada. Counsel has tried to  
7 facilitate visits with Ms. Labuda via Zoom but she had not received a copy of the draft PSR in  
8 time. Counsel needs Ms. Labuda to spend time reviewing the draft PSR before we can have  
9 meaningful meetings to discuss informal objections.  
10

11 c. The draft PSR contained significant estimated guidelines and counsel needs  
12 additional time to discuss with her client.  
13

14 d. Counsel for the defendant requires additional time to thoroughly review the draft  
15 PSR with Ms. Labuda, research and prepare informal objections, consult with her client and  
16 relevant experts/providers once their funding resumes, and to discuss the consequences and the  
17 higher estimated advisory guidelines.  
18

19 e. Counsel for the defendant believes that failure to grant the above-requested  
20 continuance would deny her the reasonable time necessary for effective preparation, taking into  
21 account the exercise of due diligence.

22 f. The government and probation do not object to the continuance.  
23

24 g. Based on the above, the defense requests the following new sentencing date along  
25 with new disclosure dates:

26 Judgment and Sentencing: January 5, 2026

27 Reply, or Statement of Non-Opposition: December 29, 2025  
28

STIPULATION AND ORDER FOR CONTINUANCE OF SENTENCING

Formal Objections to the PSR: December 22, 2025

Final PSR: December 15, 2025

Counsel's Informal Objections: December 8, 2025

All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on their behalf.

IT IS SO STIPULATED.

Dated: October 2, 2025

by: /s/Tasha Chalfant for  
JAMES CONOLLY  
Assistant U.S. Attorney  
Attorney for Plaintiff

Dated: October 2, 2025

by: /s/Tasha Chalfant  
TASHA CHALFANT  
Attorney for Defendant  
WENDY LABUDA

**ORDER**


The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

The Court orders that the sentencing currently scheduled for October 27, 2025 be continued to January 5, 2026, along with the following new disclosure dates:

Judgment and Sentencing:	January 5, 2026, 10:00 a.m.
Reply, or Statement of Non-Opposition:	December 29, 2025
Formal Objections to the PSR:	December 22, 2025
Final PSR:	December 15, 2025
Counsel's Informal Objections:	December 8, 2025

IT IS SO FOUND AND ORDERED.

Dated: October 2, 2025

  
**WILLIAM B. SHUBB**  
**UNITED STATES DISTRICT JUDGE**